

EXHIBIT A

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

BEGASHAW AYELE,

Plaintiff,

v.

COGNISA SECURITY COMPANY, INC.,

Defendant.

Civil Action No.: 04CV12217-PBS

DECLARATION OF AARON FEO

1.

I, Aaron Feo, am of majority age, competent to testify and make this Declaration based on personal knowledge of facts I know to be true and correct.

2.

I was hired by Cognisa Security, Inc. ("Cognisa") in 1998. I am currently employed with Cognisa as a Field Human Resources Manager.

3.

Cognisa is an Atlanta-based corporation that provides commercial security services to customers on a nationwide basis. Cognisa employs security officers who are placed on assignments at customers' premises. Cognisa maintains an office in Boston, Massachusetts to support its commercial security services in the greater Boston area.

4.

Before being hired, applicants for security officer positions must undergo and pass a drug screening, complete an employment application and other pre-employment paperwork, and

authorize Cognisa to conduct a criminal background check. Once hired, security officers have numerous job duties (which vary by assignment), including patrolling the customer job sites, reporting security breaches, and communicating with emergency services when necessary, among others. For the vast majority of assignments, security officers must be able to walk to perform their regular duties. Patrolling the customer's job site is an essential job function whenever the assignment requires the officer to periodically check the security of multiple areas within a job site or to verify that multiple entrances and exits are locked. Attached to this Declaration as Exhibit 1 is a true and correct copy of the job description for Cognisa security officers.

5.

In June 2004, Begashaw Ayele filed a charge of discrimination against Cognisa with the Equal Employment Opportunity Commission ("EEOC"). As part of my normal job duties, I investigated Mr. Ayele's charge of discrimination and prepared the Position Statement that Cognisa submitted to the EEOC.

6.

While investigating Mr. Ayele's EEOC charge, I learned that on November 20, 2003, Cognisa conducted a job fair at the Massachusetts Division of Career Services ("DCS") in Boston, seeking qualified candidates for a security officer position.

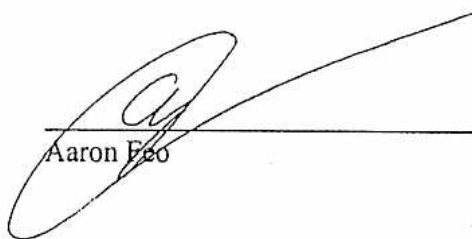
7.

My review of Cognisa's business records reveals that four applicants (including Mr. Ayele) attended the job fair, that one of the applicants was white and three were black, and that none of the applicants were hired as a result of the fair. Attached to this Declaration as Exhibit 2

is a true and correct copy of the Applicant Flow Log that was created immediately following Cognisa's November 20, 2003 job fair at DCS. Cognisa maintains this and similar Applicant Flow Logs in the ordinary course of business.

I declare under penalty of perjury that the foregoing is true and correct.

Executed this 14 day of June, 2005.

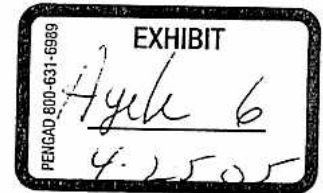


Aaron Foo

EXHIBIT 1



JOB DESCRIPTION



Job Title: Security Officer (SO)
Department: Operations
Reports to: Site Supervisor/Area/Account Manager
EEO Job Cat: Category VIII, Protective Service Workers
FLSA Status: Non-Exempt
Compensation: Hourly

I. JOB FUNCTION

- Guards industrial or commercial property against fire, theft, vandalism and unauthorized access. Strictly adheres to customer approved and company implemented site post orders outlined in customer service agreement

II. MAJOR RESPONSIBILITIES

- Maintain proper personal hygiene and professional uniform appearance for superior customer service presentation.
- Read, understand and strictly adhere to all post orders.
- Courteous, respectful and responsive to customers and the general public.
- Project positive and confident professional image.
- Maintain the highest ethical standards.
- Communicate in a professional manner with supervisors, customers and the public.
- Per post orders, may patrol customer industrial and commercial premises to prevent and detect signs of intrusion and ensure security of doors, windows, gates and other access points to facilities.
- Watch for and reports irregularities such as fire hazards, leaking water pipes and secure access points.
- Warn persons of rule infractions or violations and apprehends or evicts violators from customer premises, using only appropriate force when necessary.
- Contact emergency services (police, fire etc.) in cases of customer emergency.
- Operate detecting devices to screen individuals and prevent passage of prohibited articles into restricted areas designated by the customer.
- Answer telephone calls to take messages, answer questions and provide information during non-business hours or when customer switchboard is closed.
- Register at post to record time of any inspection trips.
- Participate in training and is prepared for emergency situations at site.
- Operate a company or customer motor vehicle in accordance with post orders, or as otherwise directed by the company.

III. MINIMUM POSITION QUALIFICATIONS

- Must have a valid state security officer license, if applicable.
- Must be 21 years of age or have 3 years responsible work experience.
- Must have a high school diploma or GED equivalent.
- Must be able to read, write and understand English.
- Must be eligible to work in the United States.
- No prior security experience is necessary.

IV. OTHER REQUIREMENTS

- Customer focus and desire to meet customer expectations.
- Present a positive and professional image.

V. POSITIONS SUPERVISED

- None.

VI. EQUIPMENT USED

- General office equipment including, but not limited to, personal computer, telephone (including cellular), fax and copier

VII. PHYSICAL REQUIREMENTS/WORK ENVIRONMENT

- The physical demands described here are representative of those that must be met by an employee to successfully perform the essential functions of this job. Reasonable accommodations may be made to enable individuals with disabilities to perform the essential functions. While performing the duties of this position the employee is frequently required to stand, walk, sit, use hands to finger, handle or feel and reach with hands and arms. The employee must frequently lift and/or move up to 35 pounds and occasionally lift and/or move up to 50 pounds. Specific vision abilities required by this job include close vision, distance vision, color vision, peripheral vision, depth perception and the ability to adjust focus.
- The work environment characteristics described are representative of those an employee encounters while performing the essential functions of this job. Reasonable accommodation may be made to enable individuals with disabilities to perform the essential functions. While performing the duties of this position the employee is occasionally exposed to outside weather conditions as they relate to travel. The noise environment is usually moderate.

EXHIBIT 2

